



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

May 16, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6195 8480

Mr. Dan Conners
Facility Manager
Mammoth Hospital
P.O. Box 660
Mammoth Lakes, California 93546
danny.conners@mammothhospital.com

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT MAMMOTH HOSPITAL, 85 SIERRA PARK ROAD, MAMMOTH
LAKES**

Dear Mr. Conners:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on April 27, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, was not available in CERS or onsite at the time of the inspection.	Diesel	April 27, 2018	Ongoing	23 CCR 2711(a)(8)
2	Failure to Maintain Monitoring or Testing Records On-site – The 2017, 2016, and 2015 annual monitoring certification records and pipe integrity tests were not onsite at the time of inspection. In addition, the August 2017 enhanced leak detection testing results were not onsite at the time of inspection.	Diesel	April 27, 2018	Ongoing	H&SC 25293; 23 CCR 2712(b)

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FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

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No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Provide Designated Operator (DO) Training – The DO training record dated April 14, 2018, lists one trained employee at this facility. At least one trained employee must be present during operating hours at a 24-hour facility.	Diesel	April 14, 2018	Ongoing	23 CCR 2715(f)
4	Failure to Maintain Financial Responsibility – In CERS, the Certificate of Financial Responsibility lists insurance policies that have expired.	Diesel	April 27, 2018	Ongoing	H&SC 25292.2; 23 CCR 2711(a) (11)
5	Failure to Maintain Tank Information (Form B) – In CERS, the tank description lists the tank manufacturer as unknown; however, it should list Modern Welding. The number of compartments lists 2; however, it should list the number as 1. Under tank construction, fill tube shut off valve lists “no”; however, one was observed during inspection. Under fill components installed, striker plate/bottom protector and containment sump list “no”; however, both should list “yes.” Under corrosion protection isolation lists “no”; however, is should list “yes.”	Diesel	April 27, 2018	Ongoing	23 CCR 2711(a)
6	Failure to Maintain UST Monitoring System – The audible alarm on the Incon TS-1001 monitoring system was off. Continuous monitoring system shall be connected to an audible and visual alarm system.	Diesel	April 27, 2018	Ongoing	H&SC 25290.2(d); 23 CCR 2632(c)(2)(B)
7	Failure to Install Line Leak Detectors (LLD) – LLDs are not installed on the diesel turbines servicing the boiler systems.	Diesel	April 27, 2018	Ongoing	H&SC 25290.2(g); 23 CCR 2636(f)(2)
8	Failure to Continuously Monitor Emergency Generator Double-Walled, Pressurized Piping – A daily log demonstrating that the monitoring system is checked daily was not present at the time of inspection.	Diesel	April 27, 2018	Ongoing	23 CCR 2636(f)(6)

No.	Violation	Tank	Start Date	Stop Date	Regulation
9	Failure to Monitor Product Piping – The sensor located inside fill sump 7-LD was not at the lowest point in the sump. The testing boots in sumps 5-LD, 4-LD, and 3-LD must be pulled back or the stems pointed down between 3 and 9 o'clock positions with the Schrader valve pulled out. Lastly, the clamshell test fittings in transition sump 4-LD have their testing valves positioned upward and the clamshell fittings in turbine sump 5-LD have no valves in place. The observed placement of these sensors, boots, and clamshells prevent the detection of a leak at the earliest opportunity.	Diesel	April 27, 2018	Ongoing	23 CCR 2630(d)
10	Failure to Maintain Tank System Liquid and Vapor Tight – Liquid was observed in both diesel turbine sumps 5-LD and 7-LD. Liquid was also observed inside transition sump 1-LD. Sump 1-LD is not liquid tight.	Diesel	April 27, 2018	Ongoing	H&SC 25290.2(c)(3)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Mono County Health Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Mr. Louis Molina
Environmental Health Director
Mono County Health Department
P.O. Box 476
Bridgeport, California 93517
lmolina@mono.ca.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

May 16, 2018

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Louis Molina
Environmental Health Director
Mono County Health Department
lmolina@mono.ca.gov

Mr. Jeff McMillian
Chief Engineer
Mammoth Hospital
jeff.mcmillan@mammothhospital.com